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February 15, 2024

Via ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Huckabee et al. v. Meta Platforms, Inc. et al.*, No. 1:23-cv-09152-LGS

Dear Judge Schofield:

Pursuant to Paragraph I.B.1 of Your Honor's Individual Rules, Defendants Bloomberg L.P. and Bloomberg Finance L.P. (together, "Bloomberg") write to request clarity regarding the briefing schedule for their proposed motion to dismiss.

On January 31, 2024, Bloomberg filed a pre-motion letter (Dkt. No. 76) informing the Court of its intent to move to dismiss Plaintiffs' First Amended Class Action Complaint ("Amended Complaint," Dkt. No. 74). Pursuant to Paragraph III.C.2 of the Individual Rules, Bloomberg proposed to file its motion to dismiss on February 23, 2024, with Plaintiffs' opposition due March 22 and Bloomberg's reply due April 5. (*Id.* at 1 n.1.) On February 7, Plaintiffs responded to Bloomberg's pre-motion letter. (Dkt. No. 77.) Plaintiffs did not address, oppose or propose an alternative to Bloomberg's proposed briefing schedule.

Pursuant to Paragraph III.C.2 of the Individual Rules, Bloomberg understands that the transmittal of its pre-motion letter (Dkt. No. 76) has stayed the time to answer or move until further order of the Court. But Bloomberg is also mindful that its proposed briefing deadline (February 23) now falls before the parties are scheduled to appear before the Court for an initial case management conference, which the Court recently adjourned to March 13. (Dkt. No. 79). Accordingly, in an abundance of caution, to avoid confusion and to give the parties certainty with respect to their respective briefing deadlines, Bloomberg respectfully requests that the Court enter the proposed briefing schedule, or, in the alternative, set such other briefing schedule as the Court deems appropriate.

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Respectfully submitted,



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